

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re:	:	Chapter 11
	:	
ZEN JV, LLC, <i>et al.</i> , ¹	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	X	

**NOTICE OF *SECOND AMENDED*² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JULY 28, 2025 AT 2:00 P.M. (ET), BEFORE THE HONORABLE
J. KATE STICKLES, AT THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF DELAWARE, 5th FLOOR, COURTROOM 6**

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Stickles' Chambers Procedures (<https://www.deb.uscourts.gov/judge-j-kate-stickles>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

I. RESOLVED MATTER:

1. Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing Payment of Certain Prepetition Workforce Obligations, (B) Authorizing Continuance of Workforce Programs, (C) Authorizing Payment of Withholding and Payroll-Related Taxes, (D) Authorizing Payment of Prepetition Claims Owing to Administrators, and (E) Granting Related Relief [[Docket No. 27](#) – filed June 25, 2025]

Objection / Response Deadline: July 17, 2025 at 4:00 p.m. (ET); extended for the Official Committee of Unsecured Creditors (the "Committee") to July 23, 2025 at 11:59 p.m. (ET)

¹ The Debtors in these cases, along with the last four digits of each debtor's federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors' address is 200 N LaSalle Street #900, Chicago, IL 60601.

² **Amended items appear in bold.**

Objections / Responses Received:

- A. Informal comments from Office of the United States Trustee (the “U.S. Trustee”)
- B. Informal comments from the Committee
- C. Informal comments from the Chubb Companies (“Chubb”)

Related Documents:

- i. Interim Order (A) Authorizing Payment of Certain Prepetition Workforce Obligations, (B) Authorizing Continuance of Workforce Programs, (C) Authorizing Payment of Withholding and Payroll-Related Taxes, (D) Authorizing Payment of Prepetition Claims Owning to Administrators, and Granting Related Relief [[Docket No. 53](#) – entered June 27, 2025]
- ii. Notice of (I) Entry of Interim Order (A) Authorizing Payment of Certain Prepetition Workforce Obligations, (B) Authorizing Continuance of Workforce Programs, (C) Authorizing Payment of Withholding and Payroll-Related Taxes, (D) Authorizing Payment of Prepetition Claims Owning to Administrators, and Granting Related Relief; and (II) Final Hearing Thereon [[Docket No. 58](#) – filed June 27, 2025]
- iii. Certification of Counsel Regarding Revised Final Order (A) Authorizing Payment of Certain Prepetition Workforce Obligations, (B) Authorizing Continuance of Workforce Programs, (C) Authorizing Payment of Withholding and Payroll-Related Taxes, (D) Authorizing Payment of Prepetition Claims Owning to Administrators, and (E) Granting Related Relief [[Docket No. 201](#) – filed July 22, 2025]
- iv. Final Order (A) Authorizing Payment of Certain Prepetition Workforce Obligations, (B) Authorizing Continuance of Workforce Programs, (C) Authorizing Payment of Withholding and Payroll-Related Taxes, (D) Authorizing Payment of Prepetition Claims Owning to Administrators, and (E) Granting Related Relief [[Docket No. 202](#) – entered July 22, 2025]

Status: On July 22, 2025, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

II. MATTERS GOING FORWARD:

- 2. Motion of Debtors for Entry of Orders (I) Authorizing and Approving (A) the Bidding Procedures for Sale of the Debtors’ Assets Free and Clear, (B) the Scheduling of an Auction and Sale Hearing, (C) the Form and Manner of Notice of Sales, Auctions, and Sale Hearings, (D) the Notice and Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases, (E) the Designation of Stalking Horse Bidders, and (F)

the Debtors' Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (II) Authorizing Designation of Stalking Horse Bidders, and (III) Granting Related Relief [[Docket No. 28](#) – filed June 25, 2025]

Sale Objection / Response Deadline: July 16, 2025 at 4:00 p.m. (ET)

Cure Objection / Response Deadlines: July 14, 2025 at 4:00 p.m. (ET) (for the Initial Assumption Notice (as defined below)) and July 21, 2025 at 4:00 p.m. (ET) (for the Supplemental Assumption Notice (as defined below))

Post-Auction Objection Deadline: July 25, 2025 at 12:00 p.m. (ET)

Objections / Responses Received:

- A. Oracle's Limited Objection to and Reservation of Rights Regarding Debtors' Sale Motion and Related Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases [[Docket No. 131](#) – filed July 15, 2025]
- B. Informal comments from the Committee
- C. Informal comments from the pre-petition and post-petition lenders

Cure Objections / Responses Received:

- A. Equinix, Inc.'s Objection to Cure Notices [[Docket No. 126](#) – filed July 14, 2025]
- B. Objection of the Morning Consult LLC to Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases [[Docket No. 128](#) – filed July 14, 2025]
- C. Initial Objection of Randstad N.V. and Randstad North America Inc. to Debtors' Proposed Cure Amounts [[Docket No. 130](#) – filed July 14, 2025]
- D. Oracle's Limited Objection to and Reservation of Rights Regarding Debtors' Sale Motion and Related Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases [[Docket No. 131](#) – filed July 14, 2025]
- E. Objection of Ikkas Technologies Private Limited to Notice of Potential Assumption and Assignment of Executory Contracts and Unexpired Leases [[Docket No. 132](#) – filed July 14, 2025]
- F. Objection and Reservation of Rights (filed by Beacon Hill Solutions Group, LLC) [[Docket No. 133](#) – filed July 14, 2025]
- G. SecureIT Consulting Group, Inc.'s Objection to Notice of Potential Assumption and Assignment of Executory Contracts and Unexpired Leases [[Docket No. 135](#) – filed July 14, 2025]

- H. Objection of Verinext Corp. to Cure Notice [[Docket No. 138](#) – filed July 14, 2025]
- I. United States of America’s Objection to Debtors’ Supplemental Notice of Possible Assumption and Assignment of Executory Contracts and Unexpired Leases [[Docket No. 143](#) – filed July 14, 2025]
- J. Objection of Salesforce, Inc. to the Potential Assumption of Certain Executory Contracts and Reservation of Rights [[Docket No. 152](#) – filed July 15, 2025]
 - (i). Declaration of Kevin Ramirez in Support of Objection of Salesforce, Inc. to the Potential Assumption of Certain Executory Contracts and Reservation of Rights [[Docket No. 154](#) – filed July 15, 2025]
- K. Objection of Bullhorn, Inc. to Potential Assumption and Assignment of Certain Executory Contracts [[Docket No. 183](#) – filed July 16, 2025]
- L. Informal response from Kforce, Inc.
- M. Informal response from Blackline Systems, Inc.
- N. Informal response from Rackspace US, Inc
- O. Informal response from Highspring LLC (f/k/a Vaco LLC)
- P. Informal response from Workday, Inc.
- Q. Informal response from United Healthcare
- R. Informal response from Jobcase, Inc.
- S. Informal response from Sigma Systems
- T. Informal response from Deltek, Inc.

Cure Status: The hearing on this matter regarding the cure objections is adjourned to a date to be determined if necessary.

Related Documents:

- i. Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases [[Docket No. 82](#) – filed July 3, 2025] (the “Initial Assumption Notice”)
- ii. Declaration of Jesse DelConte in Support of the Debtors’ Bidding Procedures [[Docket No. 94](#) – filed July 7, 2025]
- iii. Declaration of James Lilly in Support of the Debtors’ Bidding Procedures and Stalking Horse Agreements [[Docket No. 95](#) – filed July 7, 2025]

- iv. Order (I) Authorizing and Approving (A) the Bidding Procedures for Sale of the Debtors' Assets Free and Clear, (B) the Scheduling of an Auction and Sale Hearing, (C) The Form and Manner of Notice of Sales, Auctions, and Sale Hearings, (D) the Notice and Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases, (E) the Designation of Stalking Horse Bidders, and (F) the Debtors' Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (II) Authorizing Designation of Stalking Horse Bidders, and (III) Granting Related Relief [[Docket No. 110](#) – entered July 8, 2025]
- v. Notice of Sale Bidding Procedures, Potential Auction, and Sale Hearing [[Docket No. 111](#) – filed July 8, 2025]
- vi. Supplemental Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases [[Docket No. 123](#) – filed July 11, 2025]
- vii. Amended Supplemental Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases [[Docket No. 129](#) – filed July 14, 2025] (the “Supplemental Assumption Notice”)
- viii. Proof of Publication [[Docket No. 153](#) – filed July 15, 2025]
- ix. Notice of Amendment to Contracts Schedule of Potentially Assigned Contracts [[Docket No. 186](#) – filed July 16, 2025]
- x. Notice of (I) Auction Transcript and (II) Successful and Backup Bids [[Docket No. 194](#) – filed July 19, 2025]
- xi. Omnibus Notice of Proposed Orders Approving Sales of Debtors' Assets [[Docket No. 205](#) – filed July 24, 2025]
- xii. Declaration of James Lilly in Support of the Debtors' Sales [[Docket No. 208](#) – filed July 24, 2025]
- xiii. Notice of Form Transaction Services Agreement [[Docket No. 210](#) – filed July 25, 2025]
- xiv. Notice of Filing of Job Board Asset Purchase Agreement [[Docket No. 219](#) – filed July 25, 2025]
- xv. **Consumer Privacy Ombudsman Report** [[Docket No. 178](#) – filed July 16, 2025]
- xvi. **Notice of Filing of Executed Job Board Asset Purchase Agreement** [[Docket No. 224](#) – filed July 28, 2025]
- xvii. **Omnibus Notice of Revised Proposed Orders Approving Sales of Debtors' Assets** [[Docket No. 225](#) – filed July 28, 2025]

Status: The hearing on this matter is going forward.

3. Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing Debtors to (I) Obtain Postpetition Financing and (II) Use Cash Collateral, (B) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (C) Granting Adequate Protection, (D) Modifying Automatic Stay, (E) Scheduling Final Hearing, and (F) Granting Related Relief [[Docket No. 31](#) – filed June 26, 2025]

Objection / Response Deadline: July 17, 2025 at 4:00 p.m. (ET); extended for the Committee

Objections / Responses Received:

- A. Informal comments from the Committee
- B. Informal comments from Chubb
- C. Informal comments from the U.S. Trustee

Related Documents:

- i. Declaration of Jesse DelConte in Support of Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing Debtors to (I) Obtain Postpetition Financing and (II) Use Cash Collateral, (B) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (C) Granting Adequate Protection, (D) Modifying Automatic Stay, (E) Scheduling Final Hearing, and (F) Granting Related Relief [[Docket No. 32](#) – filed June 26, 2025]
- ii. Interim Order (A) Authorizing Debtors to (I) Obtain Postpetition Financing and (II) Use Cash Collateral, (B) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (C) Granting Adequate Protection, (D) Modifying Automatic Stay, (E) Scheduling Final Hearing, and (F) Granting Related Relief [[Docket No. 56](#) – entered June 27, 2025]
- iii. Notice of (I) Entry of Interim Order (A) Authorizing Debtors to (I) Obtain Postpetition Financing and (II) Use Cash Collateral, (B) Granting Liens and Providing Claims With Superpriority Administrative Expense Status, (C) Granting Adequate Protection, (D) Modifying Automatic Stay, (E) Scheduling Final Hearing, and (F) Granting Related Relief; and (II) Final Hearing Thereon [[Docket No. 59](#) – filed June 27, 2025]
- iv. Notice of Filing of Proposed Final Order (A) Authorizing Debtors (I) Obtain Postpetition Financing and (II) Use Cash Collateral (B) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (C) Granting Adequate Protection, (D) Modifying Automatic Stay, and (E) Granting Related Relief [[Docket No. 218](#) – filed July 25, 2025]

Status: The hearing on this matter is going forward.

Dated: July 28, 2025
Wilmington, Delaware

LATHAM & WATKINS LLP

Ray C. Schrock (admitted *pro hac vice*)
Candace M. Arthur (admitted *pro hac vice*)
1271 Avenue of the Americas
New York, New York 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
Email: ray.schrock@lw.com
candace.arthur@lw.com

- and -

Jonathan C. Gordon (admitted *pro hac vice*)
330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611
Telephone: (312) 876-7700
Facsimile: (312) 993-9767
Email: jonathan.gordon@lw.com

/s/ Huiqi Liu

RICHARDS, LAYTON & FINGER, P.A.

Daniel J. DeFranceschi (No. 2732)
Zachary I. Shapiro (No. 5103)
Huiqi Liu (No. 6850)
Clint M. Carlisle (No. 7313)
Colin A. Meehan (No. 7237)
One Rodney Square
920 North King Street
Wilmington, Delaware 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
Email: defranceschi@rlf.com
shapiro@rlf.com
liu@rlf.com
carlisle@rlf.com
meehan@rlf.com

Proposed Co-Counsel for Debtors and Debtors in Possession